

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BONNIE WEBB, on behalf of plaintiff and a
class,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT, INC.,
MIDLAND FUNDING, LLC and ENCORE
CAPITAL GROUP, INC.,

Defendants.

Case No. 11-cv-5111

Judge Joan H. Lefkow
Magistrate Judge Martin C. Ashman

**DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO ANSWER COMPLAINT**

Defendants MIDLAND CREDIT MANAGEMENT, INC. ("MCM"), MIDLAND FUNDING, LLC ("Midland, LLC") and ENCORE CAPITAL GROUP, INC. ("Encore") (collectively "defendants"), by their attorneys, David M. Schultz and Clifford E. Yuknis, of Hinshaw & Culbertson LLP, respectfully moves this Honorable Court for an additional 28-day enlargement of time to answer, move or otherwise plead to Plaintiff's Class Action Complaint ("Complaint") to and including September 19, 2011. In further support of this motion, defendants state as follows:

1. Plaintiff's Complaint purports to state claims against defendant for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (FDCPA).
2. Plaintiff filed her Complaint in this matter on July 28, 2011.
3. Defendants MCM and Midland, LLC were served with the Complaint on August 1, 2011 and their answer or other responsive pleading is due August 22, 2011.
4. Defendant Encore was served on or about August 5, 2011 and its answer is due on or about August 26, 2011.

5. Defendants requests an additional 28-days to answer, move or otherwise plead, from the August 22, 2011 due date to and including September 19, 2011. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

6. Counsel for Plaintiff and Defendant have conferred on this matter and Plaintiff's attorneys have no objection to this motion.

WHEREFORE, Defendants MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC and ENCORE CAPITAL GROUP, INC. respectfully requests that this Court grant it a 28-day enlargement of time up to and including September 19, 2011, to answer, move or otherwise plead to Plaintiff's Class Action Complaint.

HINSHAW & CULBERTSON LLP

By: /s/ Clifford E. Yuknis

One of the Attorneys for Defendants
MIDLAND CREDIT MANAGEMENT,
INC., MIDLAND FUNDING, LLC and
ENCORE CAPITAL GROUP, INC.

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